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March 24, 1989

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1980-566-40-66
Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jonathan Levin

Re: MUR 2314
National Republican
Senatorial Committee, and
Frederick W. Bassinger, as
Treasurer

Dear Mr. Noble:

On February 27, 1989, you granted the National Republican Senatorial Committee and Frederick W. Bassinger, as Treasurer, an extension of until March 27, 1989 to respond to the subpoena and order for the production of documents and answers to interrogatories in the above-captioned MUR. This extension was requested, in part, because a meeting with Jonathan Levin, the staff attorney assigned to this case, had been scheduled for March 14, 1989.

Because of illness, the meeting with Mr. Levin did not occur until Monday, March 20, 1989, four days ago. At that meeting we attempted to more narrowly define the materials needed by the General Counsel's Office in the MUR, to no avail. Accordingly, our clients are currently continuing their efforts to locate and assemble the requested documents and financial information.

There are, however, several factors which are hindering this process, and of which the Commission should be aware. First, and most significantly, since the time of the matters at issue in this MUR the staff of the National Republican Senatorial Committee (including, but not limited to, the Chairman, Executive Director, Director of Finance, Comptroller, and Legal Counsel) have changed not once but twice. No individual currently in these positions of authority at the National Republican Senatorial Committee

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(the "Committee") had responsibilities for any of the activities of the Committee at issue here, nor do they now have personal knowledge of much of these matters. Second, the materials sought by the Commission in the MUR are widely scattered, partly because the Committee has recently moved into a new building and old files have been reorganized and stored, and partly because much of the material was already divided between a variety of Committee and vendor files, some on paper and some only retrievable on computer tape. Finally, the simple fact is that the Commission is requesting our client to assemble this widely scattered financial information from the 1986 election cycle in a manner different from the way the Committee had previously maintained it, so that a two-step process is involved: the Committee must first locate and assemble the underlying financial data, and must then create new data in order to produce responses in the form requested by the General Counsel's Office.

Those few Committee staffers with sufficient historic knowledge to assemble these materials are working to do so. However, they are currently unable to indicate how many weeks it will take to complete this task. Accordingly, the Committee will produce the materials and answers requested by the General Counsel's Office in the MUR as soon as possible although it will clearly not be able to do so by March 27th.

I deeply regret this delay, but my client is working hard to comply with the Commission's requests under very difficult circumstances, as indicated by the above description of the situation.

Sincerely yours,


Jan W. Baran

JWB/TP:co

cc: William Canfield, Esquire